

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: Beckham Jewelry, LLC, Debtor

**Case No. 25-01234-JAW
CHAPTER 11**

RESPONSE

COMES NOW, Debtor, by and through counsel, and responds to Creditor, TDLDC Retail I, LLC's ("Landlord") Motion for Order Rejecting Business Lease (dk # 41) as follows:

1. Debtor commenced this case on May 4, 2025 by filing a voluntary petition for relief under Chapter 11 of Title 11 of the United States Bankruptcy Code.
2. Debtor and Landlord have engaged in constructive, good-faith negotiations aimed at resolving all lease-related issues since the Motion was filed.
3. Those discussions focus on (i) authorizing a short-term, supervised liquidation sale of the store's inventory and (ii) vacating the premises promptly after the sale's conclusion.
4. Debtor believes the material terms of a consensual resolution are within reach and optimistic that an agreement can be presented to the Court by the hearing date.

WHEREFORE, Debtor prays for an Order denying the Motion and for such additional or alternative relief as may be just and proper.

Respectfully submitted,

By: /s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MSBN 103469)
Attorney for Debtor

Of Counsel:
Thomas C. Rollins, Jr. (MSBN 103469)
Jennifer A Curry Calvillo (MSBN 104367)
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
trollins@therollinsfirm.com
601-500-5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Response was forwarded on June 17, 2025, to:

By USPS First Class Mail:

TDLDC Retail I, LLC
300 Concourse Blvd
Ste 105
Ridgeland, MS 39157

By Electronic CM/ECF Notice:

Robert B. Ireland, III, Attorney for Creditor

Craig M Geno, Trustee

U.S. Trustee

/s/ Thomas C. Rollins, Jr. _____
Thomas C. Rollins, Jr.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

Beckham Jewelry, LLC

CASE NO: 25-01234

**DECLARATION OF MAILING
CERTIFICATE OF SERVICE**

Chapter: 11

On 6/17/2025, I did cause a copy of the following documents, described below,
Response

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 6/17/2025

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

The Rollins Law Firm
702 West Pine St
Hattiesburg, MS 39401
601 500 5533
trollins@therollinsfirm.com

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

Beckham Jewelry, LLC

CASE NO: 25-01234

**CERTIFICATE OF SERVICE
DECLARATION OF MAILING**

Chapter: 11

On 6/17/2025, a copy of the following documents, described below,

Response

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 6/17/2025



Miles Wood
BK Attorney Services, LLC
d/b/a certificateofservice.com, for
Thomas C. Rollins, Jr.
The Rollins Law Firm
702 West Pine St
Hattiesburg, MS 39401

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

FIRST CLASS

TDLDC RETAIL I, LLC
300 CONCOURSE BLVD
STE 105
RIDGELAND MS 39157